



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NEW YORK 10007

BRACHAH GOYKADOSH
Senior Counsel
bgoykado@law.nyc.gov
Phone: (212) 356-3523
Fax: (212) 356-1148

August 27, 2021

By ECF

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Lori Gjenashaj v. City of New York, et al.*, No. 19 Civ. 4142 (CM) (GWG)

Your Honor:

I am a Senior Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York and the attorney assigned to represent the defendants in the above-referenced action. The parties write jointly to respectfully request that the Court adjourn the trial to February 28, 2022.

A trial in this matter is scheduled to commence on October 4, 2021 but one of the defendants is unavailable then. ECF No. 119, 139. The Court has invited the parties to suggest dates when they would be available for a trial during the first quarter of 2022.¹ ECF No. 140.

The parties would be available for a trial during the week of February 28, 2022. The parties are also available during the subsequent weeks of March 7, 2022 and March 14, 2022; however, the week of February 28, 2022 would be the parties' very strong preference, should the Court be able to accommodate that date. While the parties understand the constraints that COVID protocols have created and the limited availability of trial dates, both plaintiff and defendants are eager for a trial in this matter. Therefore, should the Court be able to schedule a "trial date certain," and not a "trial ready date" or "back up trial date," the parties would be very grateful.

Thus, the parties respectfully request that the Court adjourn the trial currently scheduled for October 4, 2021 to February 28, 2022.

Thank you for your consideration herein.

Respectfully submitted,

Brachah Goykadosh
Senior Counsel
Special Federal Litigation Division

¹ Defendants requested two adjournments of an October 4, 2021 trial date based on this defendants' unavailability. ECF Nos. 119, 139. The first request was granted by Judge Pauley but the second request was denied by this Court, as Your Honor was unable to "accommodate the request." ECF Nos. 121, 140. While the Court suggested October 18, 2021 as a potential trial date, unfortunately, a non-party witness is unavailable during that week.